

EXHIBIT B

APPENDIX: INDEX OF PLAINTIFF'S CHALLENGED WITHHOLDINGS

DHS-OIG Records and Withholdings in Part			
Document Bates No.	Document Description	Challenged Exemptions	Entry Number on Defendants' Vaughn Index
Nov. 2022: 0015-16	Memorandum of Activity (MOA) re: Medina Leon: description of medical intake by ICE medical staff and lab test results	6, 7(c)	#3 (p. 6)
Nov. 2022: 0020	MOA re: Medina Leon: description of medical intake by ICE medical staff	6, 7(c)	#4 (p. 8)
Nov. 2022: 0023-24	MOA re: Medina Leon: Deportation Office description of decision to release Medina Leon	6, 7(c)	#5 (p. 9)
Nov. 2022: 0025-26	MOA re: Medina Leon: description of medical intake by ICE medical staff and lab test results	6, 7(c)	#7 (p. 12)
Nov. 2022: 0028-29	MOA re: Medina Leon: Deportation Office description of decision to release Medina Leon	6, 7(c)	#7 (p. 12)
Nov. 2022: 0033	MOA re: Medina Leon: description of medical intake by ICE medical staff, and contents of email to ICE management from ICE Field Medical Coordinator	6, 7(c)	#3 (p. 6)
Nov. 2022: 0037	MOA re: Medina Leon: description of cause of death listed on death certificate	6, 7(c)	#7 (p. 12)
Nov. 2022: 0038	Medina Leon Death Certificate: redaction of cause of death	6, 7(c)	#8 (p. 13) #10 (p.15)
Nov. 2022: 0039	MOA re: Medina Leon: description of declined medical test	6, 7(c)	None listed
Nov. 2022: 0041	MOA re: Medina Leon: description of symptoms and description of contents of email from detention center medical staff titled "Hospital Update"	6, 7(c)	#7 (p. 12)

Nov. 2022: 0050	MOA re: Medina Leon: description of conversation with Medina Leon prior to release from custody	6, 7(c)	#7 (p. 12)
Dec. 2022: 0037	Report of Investigation re: Medina Leon: results of blood test	6, 7(c)	#7 (p. 12)
Dec. 2022: 0040	Report of Investigation re: Medina Leon: description of blood test; results of OIG interview with Medina Leon's deportation officer about documents prior to issuance of Notice to Appear (NTA) paperwork (necessary to release Medina Leon from custody)	6, 7(c)	#5 (p. 9)
Dec. 2022: 0041	Report of Investigation re: Medina Leon: description of medical intake, and information/action taken by doctor at detention facility prior to and during her hospitalization	6, 7(c)	#7 (p. 12)
Dec. 2022: 0042	Report of Investigation re: Medina Leon: information related to release from custody	6, 7(c)	#5 (p. 9)
Dec. 2022: 0044	Report of Investigation re: Medina Leon: results of blood test; information related to Medina Leon's request to enter the United States	6, 7(c)	#5 (p. 9)
Dec. 2022: 0044	Report of Investigation re: Medina Leon: results of blood test	6, 7(c)	#7 (p. 12)
Dec. 2022: 0051	MOA re: Medina Leon: Information that detention medical staff admitted he had heard from Medina Leon prior to her release from custody	6, 7(c)	#7 (p. 12)
Dec. 2022: 0055-56	MOA re: Medina Leon: description of medical intake by ICE medical staff; blood test results	6, 7(c)	#3 (p. 6)
Dec. 2022: 0067-68	MOA re: Medina Leon: results of interview with Medina Leon's deportation officer in memorandum	6, 7(c)	#5 (p. 9)

	describing her release from custody, description of contents of her immigration file		
Dec. 2022: 0070	MOA re: Medina Leon: description of medical intake by ICE medical staff and lab test results	6, 7(c)	#7 (p. 12)
Dec. 2022: 0070	MOA re: Medina Leon: description of ICE facility doctor's recollection of medical condition and notification to Medina Leon of redacted information	6, 7(c)	#7 (p. 12)
Dec. 2022: 0075	MOA re: Medina Leon: report from Medina Leon's Supervisory Detention and Deportation Officer regarding documents received prior to Medina Leon's release	6, 7(c)	#5 (p. 9)
Dec. 2022: 0076	MOA re: Medina Leon: report from Medina Leon's Supervisory Detention and Deportation Officer regarding information in email received from ICE Health Service Corps that recommended an alternative to detention.	6, 7(c)	#7 (p. 12)
Dec. 2022: 0084	MOA re: Medina Leon: description of medical condition and intake questions prior to her release	6, 7(c)	#11 (p.17)
Dec. 2022: 0092	MOA re: Medina Leon: description of cause of death on Medina Leon's death certificate	6, 7(c)	#10 (p.15)
Dec. 2022: 0097	MOA re: Medina Leon: description of medical condition on "Hospital Send Out" form completed by detention facility prior to Medina Leon's hospitalization; contents of email from detention center re: "Hospital Update"	6, 7(c)	#7 (p. 12)
Dec. 2022: 0099	MOA re: Medina Leon: description of procedure or test performed by	6, 7(c)	#5 (p. 9), #7 (p. 12)

	detention facility prior to her hospitalization		
Mar. 2023: 0048-49	Draft questions/media talking points regarding Medina Leon's death; redaction of medical condition, and ICE's decision not to conduct screening for redacted medical condition.	6, 7(c)	#14 (p. 19)
June 2023: 0001	Email regarding investigation into Medina Leon's death; redaction of information related to Medina Leon's admission to the United States, and tests performed at the detention center.	6, 7(c)	#5 (p. 9), #7 (p. 12)
June 2023: 0118	ROI regarding Teka Gulema: information related to ICE's attempts to obtain travel documents for Gulema's deportation	6, 7(c)	#6 (p. 10-11)
June 2023: 0151	ROI regarding Teka Gulema: information related to ICE's attempts to obtain travel documents for Gulema's deportation	6, 7(c)	#6 (p. 10-11)
June 2023: 0157	MOA re: Gulema: redaction of information related to Gulema's immigration history	6, 7(c)	#6 (p. 10-11)
DHS-OIG Records and Withholdings in Full			
Document Bates No.	Document Description	Challenged Exemptions	Entry Number on Defendants' Vaughn Index
March 2023: 10-36, 38-46, 50-87, 89-93, 95-98, 100-101, 104-105, 110, 112, 114-116,	Draft MOAs regarding Medina Leon – withheld in full	5	#20 (p. 24)

118, 120-121, 124-125, 129-130, 133-134, 140-141, 145-146, 148, 151, 154, 156, 159-61, 166-67			
June 2023: 3-12, 16-25, 29-38, 39-48, 52-61, 63-72, 76-85, 89, 91, 93-94	Draft MOAs regarding Medina Leon – withheld in full	5	#21 (p. 26)
July 2023: 1, 4-8, 10-12, 14-26, 28-39, 42-44, 46-58, 60-71, 75-86, 96-98, 103-107, 110-112, 123-124, 126-129, 131-132, 137-141, 149-151, 154-156, 159-161, 164-175, 182-184, 186-187, 190-191, 193-202, 206-207, 209-210,	Draft MOAs regarding Gulema – withheld in full	5	#22 (p. 28)

212-221, 227-228, 230-232, 234, 236- 237, 239, 241-242, 244, 246, 248-249, 251-252, 254, 256, 258-259, 261-269			
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